

Exhibit “G”

RANDELL C. ROBERTS

*Board Certified - Personal Injury Trial Law
American Board of Trial Advocates

MICHAEL ACE

*Board Certified - Personal Injury & Civil Trial Law
American Board of Trial Advocates

*Texas Board of Legal Specialization

www.robertslawfirm.com

mail@robertslawfirm.com

ROBERTS & ROBERTS



A Professional Corporation

ATTORNEYS AT LAW

118 W. Fourth Street
Tyler, Texas 75701-4000

BRUCE L. ROBERTS

*Board Certified - Personal Injury Trial Law

KAREN R. ROBERTS

RORY C. DUKES

NICANOR PESINA, JR.

Tel: (903) 597-6655

Fax: (903) 597-1600

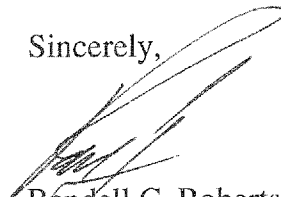
March 21, 2013

Mr. James R. Burgess
160 VZCR 2724
Mabank, TX 75147

Dear James:

We have assigned an investigator in Pennsylvania, Mr. Jim Sheridan, to assist us in investigating your accident. Please feel free to call me if you have any questions or concerns regarding any aspect of their involvement in your case.

Sincerely,



Randell C. Roberts
/ For the Firm

RCR/mb

Exhibit “H”

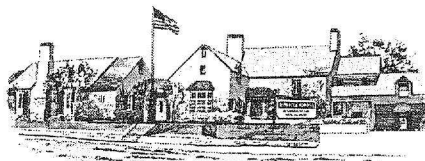
RANDELL C. ROBERTS
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KAREN R. ROBERTS
NICANOR PESINA, JR.

Tel: (903) 597-6655
Fax: (903) 597-1600

April 1, 2013

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
NO. 7001 0001 4903 3157

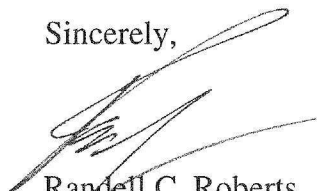
Mr. Christopher P. Clark
Clark Electrical Contractors, Inc.
RR 6, Box 6217
Montrose, PA 18801

Re: No. CV04893; James Burgess v. Patterson-
UTI Drilling Company LLC; County Court
at Law; Van Zandt County, Texas

Dear Mr. Clark:

Enclosed for your records is a copy of the Petition for Rule 202 Pre-Suit Deposition to Investigate Claims. Since it appears that you or Clark Electrical Contractors, Inc. may have an interest in this matter, we trust that you will promptly turn this Petition over to your legal representative for the appropriate action.

Sincerely,



Randell C. Roberts
For the Firm

RCR/mb

Enclosure

cc: VIA FAX

Mr. Mansur Khan
Harleysville Insurance Company
P.O. Box 198
Harleysville, PA 19438

Exhibit “I”

To: File
From: Randy
Subject: Burgess
Date: May 6, 2013

MEMORANDUM

The results from MEA indicate that there's probably two (2) million dollars in insurance coverage for Clark Electrical Contractors. More specifically, it appears that there is a one (1) million dollar general liability policy and a one (1) million dollar umbrella policy, both of which appear to be through Harleysville Insurance Company.

cc: Molly
Rhonda
Nick

Exhibit “J”

RANDELL C. ROBERTS

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MICHAEL ACE

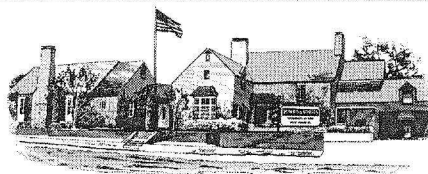
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KAREN R. ROBERTS

RORY C. DUKES

NICANOR PESINA, JR.

Tel: (903) 597-6655

Fax: (903) 597-1600

July 1, 2013

VIA FAX
AND
EMAIL

Mr. James A. Doherty, Jr.
Scanlon, Howley & Doherty
1000 Bank Towers
321 Spruce Street
Scranton, PA 18503

Re: James Burgess v. Clark Electrical
Contractors, Inc.

Dear Mr. Doherty:

It is my understanding that you have been retained by Harleysville Insurance Company to represent Clark Electrical Contractors, Inc. Assuming that this is correct, I wanted to inform you that my office has completed its preliminary investigation and that we will be submitting the necessary documentation of Mr. Burgess's claim along with an offer to settle his claim within your client's liability insurance coverage. Please confirm for me that you do represent Clark Electrical Contractors, Inc. and that the liability insurance coverage available under their business and umbrella policies for this claim is \$2,000,000.00.

As you may know, Mr. Burgess is a quadriplegic as a result of this accident. He is available for you to interview at your convenience and you remain welcome to call me. Thank you for your attention to this matter.

Sincerely,

Randell C. Roberts
For the Firm

RCR/mb

Exhibit “K”



From: Randell (Randy) C. Roberts <randy@robertslawfirm.com>
Sent: Friday, November 15, 2013 9:42 PM
To: Sheridan, Thomas W. <tsheridan@sheridanandmurray.com>
Subject: RE: Hello

Hi Tom, and its good to hear from you. I will email some information on that case to you later next week, and then we can talk. It would be great if you could help my client. --- Randy

Randell (Randy) C. Roberts

Attorney at Law
118 W. Fourth St.
Tyler, Texas 75701
Ph: (903) 597-6655 | Fax: (903) 597-1600
Board Certified - Personal Injury Trial Law
Texas Board of Legal Specialization
randy@robertslawfirm.com
www.robertslawfirm.com

From: Sheridan, Thomas W. [<mailto:tsheridan@sheridanandmurray.com>]
Sent: Friday, November 15, 2013 1:18 PM
To: Randell (Randy) C. Roberts
Subject: Hello

Randy,
I hope all is well.
I enjoyed meeting you at the AHA seminar with Rodney in Napa.
I wanted to follow up with you regarding the Pennsylvania accident case that we discussed. I apologize for my delay in reaching out to you, but I just finished a trial here in Philadelphia.
Please give me a call to discuss the case or feel free to email me the information if you would like me to review.
Sincerely, Tom



Thomas W. Sheridan
Trial Attorney

tsheridan@sheridanandmurray.com

Sheridan & Murray, LLC
1600 Market Street, 25th Floor
Philadelphia, PA 19103

tel: (215) 977-9500

Exhibit “L”

RANDELL C. ROBERTS

*Board Certified - Personal Injury Trial Law
American Board of Trial Advocates

MICHAEL ACE

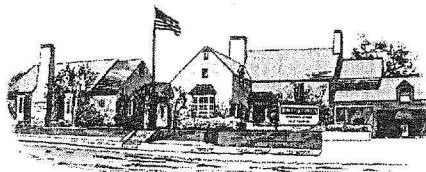
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KAREN R. ROBERTS

RORY C. DUKES

NICANOR PESINA, JR.

Tel: (903) 597-6655

Fax: (903) 597-1600

February 7, 2014

Mr. James R. Burgess
160 VZCR 2724
Mabank, TX 75147

Dear James:

I just wanted to let you know that I am still consulting with lawyers in Pennsylvania to determine how we can obtain compensation for you beyond your worker's compensation insurance benefits. I will keep you posted on my progress, however, you as well as Kay are always welcome to call me should you have any questions or concerns in this regard.

Sincerely,

Randell C. Roberts
For the Firm

RCR/mb

Exhibit “M”

From: Molly R. Brady
To: Sheridan, Thomas W.
Subject: RE: James Burgess
Date: Monday, April 7, 2014 5:15:53 PM
Attachments: image001.jpg

Would you let me know when you get caught up from vacation and would have time to talk to Mr. Roberts (maybe later this week) regarding this matter?

Thanks,

Molly R. Brady

Legal Assistant

118 W. Fourth St. Tyler, TX 75701

Ph: (903) 597-6655 | Fax: (903) 597-1600

molly@robertslawfirm.com

cid:image001.jpg@01CDCE50.B4058AA0



From: Sheridan, Thomas W. [mailto:tsheridan@sheridanandmurray.com]

Sent: Thursday, March 27, 2014 3:43 AM

To: Molly R. Brady

Subject: Re: James Burgess

Molly

I am on vacation until April 5. If Mr. Roberts wishes to speak with me before I return, I will be happy to block out some time.

Please let me know. Thanks

Tom

Sent from my iPad

On Mar 26, 2014, at 8:51 AM, "Molly R. Brady" <molly@robertslawfirm.com> wrote:

Do you have any time available this week for a conference call regarding this matter?

Thanks,

Molly R. Brady

Legal Assistant

118 W. Fourth St. Tyler, TX 75701

Ph: (903) 597-6655 | Fax: (903) 597-1600

molly@robertslawfirm.com

<image001.jpg>

From: Sheridan, Thomas W. [mailto:tsheridan@sheridanandmurray.com]

Sent: Monday, March 17, 2014 5:46 PM

To: Molly R. Brady

Subject: RE: James Burgess

Ms. Brady

I am in court all day tomorrow. Would Wednesday or Thursday work? Please let me know.

Thanks, Tom

<image002.jpg>

Thomas W. Sheridan
Trial Attorney

Sheridan & Murray, LLC
[1600 Market Street, 25th Floor](#)

From: Molly R. Brady
To: Sheridan, Thomas W.
Subject: RE: James Burgess
Date: Thursday, March 27, 2014 9:38:07 AM
Attachments: [image001.jpg](#)

No, sir. Enjoy your vacation, just holler at me when you get back and I will set something up then.

Thanks,

Molly R. Brady

Legal Assistant

118 W. Fourth St. Tyler, TX 75701

Ph: (903) 597-6655 | Fax: (903) 597-1600

molly@robertslawfirm.com

cid:image001.jpg@01CDCE50.B4058AA0



From: Sheridan, Thomas W. [<mailto:tsheridan@sheridanandmurray.com>]

Sent: Thursday, March 27, 2014 3:43 AM

To: Molly R. Brady

Subject: Re: James Burgess

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Please let me know. Thanks

Tom

Sent from my iPad

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Do you have any time available this week for a conference call regarding this matter?

Thanks,

Molly R. Brady

Legal Assistant

118 W. Fourth St. Tyler, TX 75701

Ph: (903) 597-6655 | Fax: (903) 597-1600

molly@robertslawfirm.com

<image001.jpg>

From: Sheridan, Thomas W. [<mailto:tsheridan@sheridanandmurray.com>]

Sent: Monday, March 17, 2014 5:46 PM

To: Molly R. Brady

Subject: RE: James Burgess

Ms. Brady

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Thanks, Tom

<image002.jpg>

Thomas W. Sheridan
Trial Attorney

Sheridan & Murray, LLC
[1600 Market Street, 25th Floor](#)

Philadelphia, PA 19103

tsheridan@sheridanandmurray.com
<http://www.sheridanandmurray.com>

tel: (215) 977-9500
fax: (215) 977-9800

From: Molly R. Brady [<mailto:molly@robertslawfirm.com>]

Sent: Monday, March 17, 2014 5:35 PM

To: Sheridan, Thomas W.

Subject: RE: James Burgess

Mr. Sheridan,

Would you be available tomorrow, Tuesday, March 18th, for a conference call with Mr. Roberts regarding this matter?

Molly R. Brady

Legal Assistant

118 W. Fourth St. Tyler, TX 75701

Ph: (903) 597-6655 | Fax: (903) 597-1600

molly@robertslawfirm.com

<image001.jpg>

From: Randell (Randy) C. Roberts

Sent: Friday, February 07, 2014 1:09 PM

To: Sheridan, Thomas W.

Cc: Molly R. Brady

Subject: RE: James Burgess

Thanks Tom; there is no rush. I will have Molly set up a convenient time for me to call you after I return from Rodney's workshop on February 17. ---- Randy

Randell (Randy) C. Roberts

Attorney at Law

118 W. Fourth St. Tyler, TX 75701

Ph: (903) 597-6655 | Fax: (903) 597-1600

Board Certified - Personal Injury Trial Law

Texas Board of Legal Specialization

<image001.jpg>

From: Sheridan, Thomas W. [<mailto:tsheridan@sheridanandmurray.com>]

Sent: Friday, February 07, 2014 12:48 PM

To: Randell (Randy) C. Roberts

Subject: RE: James Burgess

Randy,

sorry for my delay in responding. I have been tied up all week in mediation in a false claims act qui tam case.

I would like to talk to you about this case some more and investigate it further.

Do you have time to talk when you return from visiting Rodney?

Please feel free to call me on my cell phone over the weekend if you wish to discuss anything regarding preparation for your work session with Rodney 215-704-7730

thanks,

Tom

<image002.jpg>

Thomas W. Sheridan
Trial Attorney

tsheridan@sheridanandmurray.com
<http://www.sheridanandmurray.com>

Sheridan & Murray, LLC
1600 Market Street, 25th Floor
Philadelphia, PA 19103

tel: (215) 977-9500
fax: (215) 977-9800

From: Randell (Randy) C. Roberts [<mailto:randy@robertslawfirm.com>]

Sent: Tuesday, February 04, 2014 7:03 PM

To: Sheridan, Thomas W.

Subject: RE: James Burgess

Hi Jim,

I know you are busy. Just let me know when you have concluded that there is nothing you can do at the current time to help Mr. Burgess. Thanks --- Randy

....Btw, I am heading out to consult with Rodney next week.

Randell (Randy) C. Roberts

Attorney at Law
118 W. Fourth St. Tyler, TX 75701
Ph: (903) 597-6655 | Fax: (903) 597-1600
Board Certified - Personal Injury Trial Law
Texas Board of Legal Specialization
<image001.jpg>

From: Randell (Randy) C. Roberts

Sent: Friday, December 20, 2013 12:07 PM

To: 'Sheridan, Thomas W.'

Subject: RE: James Burgess

As promised, attached is the etrans of the depo of the employer's safety investigator. Have a Merry Christmas. --- Randy

Randell (Randy) C. Roberts

Attorney at Law
118 W. Fourth St. Tyler, TX 75701
Ph: (903) 597-6655 | Fax: (903) 597-1600
Board Certified - Personal Injury Trial Law
Texas Board of Legal Specialization
<image001.jpg>

From: Randell (Randy) C. Roberts

Sent: Tuesday, December 10, 2013 10:37 AM

To: 'Sheridan, Thomas W.'

Subject: James Burgess

Tom,

Attached are the reports from my investigator in Texas. I am still waiting on the transcript of the employer's investigator's deposition. --- Randy

Randell (Randy) C. Roberts

Attorney at Law
118 W. Fourth St. Tyler, TX 75701
Ph: (903) 597-6655 | Fax: (903) 597-1600
Board Certified - Personal Injury Trial Law
Texas Board of Legal Specialization
<image001.jpg>

From: Molly R. Brady

Sent: Tuesday, December 10, 2013 10:34 AM

To: Randell (Randy) C. Roberts

Subject: James Burgess

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CONFIDENTIALITY NOTICE: The messages contained in this email, including any and all accompanying attachments, are for the sole use of the intended recipient(s),

From: [Randell \(Randy\) C. Roberts](#)
To: [Sheridan, Thomas W.](#)
Subject: 8888-1351 Burgess, James R.: RE: James Burgess
Date: Friday, December 20, 2013 1:05:01 PM
Attachments: [image001.jpg](#)
[Zimmerman, Brian - Vol. I.PTX](#)

As promised, attached is the etrans of the depo of the employer's safety investigator. Have a Merry Christmas. --- Randy

Randell (Randy) C. Roberts

Attorney at Law
118 W. Fourth St. Tyler, TX 75701
Ph: (903) 597-6655 | Fax: (903) 597-1600
Board Certified - Personal Injury Trial Law
Texas Board of Legal Specialization
cid:image001.jpg@01CDCE50.B4058AA0



From: Randell (Randy) C. Roberts
Sent: Tuesday, December 10, 2013 10:37 AM
To: 'Sheridan, Thomas W.'
Subject: James Burgess

Tom,

Attached are the reports from my investigator in Texas. I am still waiting on the transcript of the employer's investigator's deposition. --- Randy

Randell (Randy) C. Roberts

Attorney at Law
118 W. Fourth St. Tyler, TX 75701
Ph: (903) 597-6655 | Fax: (903) 597-1600
Board Certified - Personal Injury Trial Law
Texas Board of Legal Specialization
cid:image001.jpg@01CDCE50.B4058AA0



From: Molly R. Brady
Sent: Tuesday, December 10, 2013 10:34 AM
To: Randell (Randy) C. Roberts
Subject: James Burgess

CONFIDENTIALITY NOTICE: The messages contained in this email, including any and all accompanying attachments, are for the sole use of the intended recipient(s), are confidential,

From: [Randell \(Randy\) C. Roberts](#)
To: [Sheridan, Thomas W.](#)
Subject: RE: Hello
Date: Tuesday, December 3, 2013 10:29:48 AM
Attachments: [image002.jpg](#)
[image003.jpg](#)
[Shamrock Investigations.pdf](#)

Tom,

When would be a good time for me to call you this week? The facts are fairly simple, and I think I can lay them out in a short conversation with you. As you may recall, the real barrier to making my client's claim economically viable is the intransigence of the workers' compensation subrogation interest.

By way of background, I am attaching a report from my local investigator in Pennsylvania. The heart of the investigation, however, was conducted by telephone by my investigator in Texas and his report is quite lengthy. At this point, I think I can summarize the key liability facts for you in our anticipated telephone conference. Thanks again for getting back to me and I look forward to talking to you at your convenience.. – Randy

Randell (Randy) C. Roberts

Attorney at Law

118 W. Fourth St. Tyler, TX 75701

Ph: (903) 597-6655 | Fax: (903) 597-1600

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Texas Board of Legal Specialization

cid:image001.jpg@01CDCE50.B4058AA0



From: Sheridan, Thomas W. [mailto:tsheridan@sheridanandmurray.com]

Sent: Wednesday, November 27, 2013 1:58 PM

To: Randell (Randy) C. Roberts

Subject: RE: Hello

Randy

Thanks.

I look forward to hearing from you.

Happy Thanksgiving! Tom

Exhibit “N”

F [REDACTED]

From: Randell (Randy) C. Roberts <randy@robertslawfirm.com>
Sent: Tuesday, June 24, 2014 3:23 PM
To: Sheridan, Thomas W. <tsheridan@sheridanandmurray.com>
Subject: RE: James Burgess

Hi Tom,

I assume that since we never got back together that you didn't see a way that we could work together to help this poor fellow. If I waived my financial interest in the case, I still see a way that you or an attorney in Pennsylvania could make a good fee while helping the client in this case. If you are interested in handling this case by yourself or have any recommendations on an attorney I might contact in Pennsylvania for this purpose, please let me know. Thanks, and I hope all has been going well for you. --- Randy

Randell (Randy) C. Roberts

Attorney at Law
118 W. Fourth St. Tyler, TX 75701
Ph: (903) 597-6655 | Fax: (903) 597-1600
Board Certified - Personal Injury Trial Law
Texas Board of Legal Specialization



ROBERTS & ROBERTS
ATTORNEYS AT LAW
www.robertslawfirm.com

From: Sheridan, Thomas W. [<mailto:tsheridan@sheridanandmurray.com>]
Sent: Friday, February 07, 2014 1:11 PM
To: Randell (Randy) C. Roberts
Subject: RE: James Burgess

thank you. Travel safe and have a productive session. Tom

Sent from my Verizon Wireless 4G LTE smartphone

----- Original message -----

From: "Randell (Randy) C. Roberts"
Date: 02/07/2014 2:07 PM (GMT-05:00)
To: "Sheridan, Thomas W."
Cc: "Molly R. Brady"

Exhibit “O”

RANDELL C. ROBERTS

*Board Certified - Personal Injury Trial Law
American Board of Trial Advocates

MICHAEL ACE

*Board Certified - Personal Injury & Civil Trial Law
American Board of Trial Advocates

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BRUCE L. ROBERTS

*Board Certified - Personal Injury Trial Law

KAREN R. ROBERTS

NICANOR PESINA, JR.

Tel: (903) 597-6655

Fax: (903) 597-1600

October 1, 2014

VIA EMAIL

Mr. Drew Marley
Subrogation Adjuster
Liberty Mutual Insurance Company
P.O. Box 9102
Weston, MA 02493

Re: Claim No. : WC390-A89478
Employee : James R. Burgess
Employer : Patterson-UTI Drilling Co.
Date of
Accident : December 14, 2012

Dear Drew:

This is to advise you that Mr. Thomas (Tom) W. Sheridan has assumed primary responsibility for prosecuting Mr. James R. Burgess's third-party claim.

Sincerely,

Randell C. Roberts
For the Firm

RCR/rlk

cc: VIA EMAIL

Mr. Thomas W. Sheridan
Sheridan & Murray, LLC
424 Bethlehem Pike, Third Floor
Fort Washington, PA 19034

Exhibit “P”

From: [Randell \(Randy\) C. Roberts](#)
To: [Sheridan, Thomas W.](#)
Cc: [Molly R. Brady](#)
Subject: Re: James Burgess
Date: Friday, June 27, 2014 7:16:28 PM
Attachments: [image002.jpg](#)
[image003.jpg](#)

Thanks Tom, and congratulations on your settlement. I will be out of the office on vacation this coming week but I will have Molly schedule a time for me to call you the week of July 7.

Randell C. Roberts

Attorney at Law
Roberts & Roberts
www.robertslawfirm.com
118 W. Fourth St. Tyler, TX 75701
Ph: [\(903\) 597-6655](tel:9035976655) | Fax: [\(903\) 597-1600](tel:9035971600)
Board Certified - Personal Injury Trial Law
Texas Board of Legal Specialization
randy@robertslawfirm.com
www.robertslawfirm.com

On Jun 27, 2014, at 6:03 PM, "Sheridan, Thomas W." <tsheridan@sheridanandmurray.com> wrote:

Randy,

thank you for getting back to me on this. Things are going well here. I just settled a case that I worked on with Rodney in the middle of trial.

I would be interested in representing your client. I believe we have the resources and ability to do so.

Please let me know how you wish to proceed.

I sincerely appreciate your offer. I hope all is well with you.

I look forward to hearing from you.

Sincerely, Tom

<image002.jpg>

Thomas W. Sheridan
Trial Attorney

tsheridan@sheridanandmurray.com
<http://www.sheridanandmurray.com>

Sheridan & Murray, LLC
1600 Market Street, 25th Floor
Philadelphia, PA 19103

tel: (215) 977-9500
fax: (215) 977-9800

From: Randell (Randy) C. Roberts [<mailto:randy@robertslawfirm.com>]
Sent: Tuesday, June 24, 2014 3:23 PM
To: Sheridan, Thomas W.
Subject: RE: James Burgess

Exhibit “Q”

From: [Randell \(Randy\) C. Roberts](#)
To: [Sheridan, Thomas W.](#)
Cc: [Molly R. Brady](#)
Subject: Re: James Burgess
Date: Friday, June 27, 2014 7:16:28 PM
Attachments: [image002.jpg](#)
[image003.jpg](#)

Thanks Tom, and congratulations on your settlement. I will be out of the office on vacation this coming week but I will have Molly schedule a time for me to call you the week of July 7.

Randell C. Roberts

Attorney at Law
Roberts & Roberts
www.robertslawfirm.com
118 W. Fourth St. Tyler, TX 75701
Ph: [\(903\) 597-6655](tel:9035976655) | Fax: [\(903\) 597-1600](tel:9035971600)
Board Certified - Personal Injury Trial Law
Texas Board of Legal Specialization
randy@robertslawfirm.com
www.robertslawfirm.com

On Jun 27, 2014, at 6:03 PM, "Sheridan, Thomas W." <tsheridan@sheridanandmurray.com> wrote:

Randy,
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I would be interested in representing your client. I believe we have the resources and ability to do so.
Please let me know how you wish to proceed.
I sincerely appreciate your offer. I hope all is well with you.
I look forward to hearing from you.
Sincerely, Tom

<image002.jpg>

Thomas W. Sheridan
Trial Attorney

tsheridan@sheridanandmurray.com
<http://www.sheridanandmurray.com>

Sheridan & Murray, LLC
[1600 Market Street, 25th Floor](#)
[Philadelphia, PA 19103](#)

tel: (215) 977-9500
fax: (215) 977-9800

From: Randell (Randy) C. Roberts [<mailto:randy@robertslawfirm.com>]
Sent: Tuesday, June 24, 2014 3:23 PM
To: Sheridan, Thomas W.
Subject: RE: James Burgess

Exhibit “R”

From: Molly R. Brady
To: Sheridan, Thomas W.
Subject: James Burgess
Date: Thursday, July 3, 2014 11:06:20 AM
Attachments: [image001.jpg](#)

Mr. Sheridan,

Do you have time available on Tuesday, July 8th or Wednesday, July 9th for a conference call with Mr. Roberts about this matter? If so, just let me know what time works for you (we are CST and I assume any time that you are giving me would be EST, so I will adjust that on our end accordingly) and we will call you.

Thanks,

Molly R. Brady
Legal Assistant
118 W. Fourth St. Tyler, TX 75701
Ph: (903) 597-6655 | Fax: (903) 597-1600
molly@robertslawfirm.com
cid:image001.jpg@01CDCE50.B4058AA0



From: Randell (Randy) C. Roberts
Sent: Friday, June 27, 2014 6:16 PM
To: Sheridan, Thomas W.
Cc: Molly R. Brady
Subject: Re: James Burgess

Thanks Tom, and congratulations on your settlement. I will be out of the office on vacation this coming week but I will have Molly schedule a time for me to call you the week of July 7.

Randell C. Roberts

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On Jun 27, 2014, at 6:03 PM, "Sheridan, Thomas W." <tsheridan@sheridanandmurray.com> wrote:

Randy,